

IV. REMARKS

Applicants have considered the Office Action with mailing date of May 17, 2006. Claims 1 to 26 are pending in this application. By this amendment, claims 1, 4, 5, 7, 8, 9, 11, 12, 14, 18, 20, 21, 23 and 26 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

A. REJECTION OF CLAIM 4 UNDER 35 U.S.C. §112, ¶ 2

In the Office Action, claim 4 is rejected under 35 U.S.C. §112, ¶ 2 as allegedly being indefinite. Applicants have amended the language in claim 4 replacing the phrase “requestor responsibility” with the phrase “requestor job responsibility”. Applicants submit that the amended term “requestor job responsibility” is supported by the example in ¶ [0021] of the detailed description, where “... location setting generally comprises a geographic ... as well as a job responsibility. For example, ... requestor 14 is involved in ‘production’ duties, requestor 14’s location setting could be ‘Fishkill-Production.’” This example illustrates that the term “requestor job responsibility” constitutes, duties performed by the requestor. Applicants note that the same phrase is recited in claims 11 and 20 and have replaced the same with “requestor job responsibility”. Applicants submit that the amended phrase “requestor job responsibility” better define the claims and respectfully request that the Office withdraw the objection.

B. REJECTION OF CLAIM 4 UNDER 35 U.S.C. §103(a)

In the Office Action, claims 1-6, 8-26 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Guo et. al. (US Pub. No. 2005/0120121), hereinafter “Guo”. Claim 7 is rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over “Guo” in view of Marks (US 6,876,977), hereinafter “Marks”. Applicants disagree with the Office’s interpretation of the claimed invention and respectfully traverse the rejections according to the reasons set out in the following paragraphs.

With regard to the 35 U.S.C. §103(a) rejection over Guo, Applicants assert that the cited reference fails to teach or suggest each and every feature of the claimed invention. For example, with respect to independent claim 1, Applicants respectfully assert that Guo fails to teach or suggest a method for “... selecting a back-end system from a set of back-end systems...” where the selecting is conducted on the basis of a “...location setting within a profile corresponding to the requestor...”, similarly in claim 9 as a selection system for “...selecting a back-end system from a set of back-end systems...” where the selecting is conducted on the basis of a “...location setting within a profile corresponding to the requestor...”, and in claim 18 as program code for “...selecting a back-end system from a set of back-end systems...” where the selecting is conducted on the basis of a “...location setting within a profile corresponding to the requestor...”. The Office cites, ¶ [0022], [0036] and [0043] in Guo in support of its rejection of the claimed invention. These cited paragraphs of Guo teach an authentication process as part of a routing service, where location information of a server, offering the requested service, is associated to a carry through keyword which is used to direct a user to the identified server (offering the requested service). ¶ [0009] & [0010]. However, neither the location information nor the carry through keyword of Guo

operate as the location setting of the claimed invention. Specifically, the location information of Guo is used to identify the location of the server offering the requested service and not to provide the geographical location of the requestor. Furthermore, the carry through keyword is used by Guo to associate or link the requestor to the server offering the request service and not to provide the “requestor job responsibility”. Claim 4. As such, Guo does not teach or suggest a routing service that would cater to the requestor according to the geographical location of the requestor in combination with requestor job responsibility. Accordingly, Applicants respectfully request that the Office withdraw the rejection.

As admitted by the Office on page 3 of the current Office Action, Guo does not explicitly teach the claimed feature in claim 1, which recites, *inter alia*, “...limiting a request for a second item by the requestor to an item associated with the selected back-end system”. However, the Office cites ¶ [0046] in Guo and takes Official notice that it would have been obvious to one of ordinary skill to modify Guo to include the claimed feature in ¶ [0046]. The Office has not provided any explanation or guideline as to the manner in which one of ordinary skill would do so. To this extent, the Office has not provided any factual support to establish a *prima facie* case of obviousness. Accordingly, Applicants respectfully request that the Office withdraw the rejection or provide references that teach this limitation.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity,

Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejections.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

V. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

Respectfully submitted,



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